

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

LAMONT HARRIS	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.: 3:18-cv-00588-MHL
	)	
	)	
MARINER FINANCE, LLC	)	
	)	
Defendant.	)	

**MARINER FINANCE, LLC’S MOTION TO ENFORCE THE PARTIES’ AGREEMENT,  
COMPEL ARBITRATION, AND TO DISMISS THE AMENDED COMPLAINT**

Defendant Mariner Finance, LLC (“Mariner”) submits this Motion to Enforce the Parties’ Agreement, Compel Arbitration of the Plaintiff’s claims against Mariner, and Dismiss the Amended Complaint under Fed. R. Civ. P. 12(b)(1), Fed. R. Civ. P. 12(b)(3), and the Federal Arbitration Act. As demonstrated in the accompanying Memorandum, which is incorporated by reference, the Plaintiff, Lamont Harris, expressly agreed to arbitrate his claims against Mariner. This Court should enforce the parties’ agreement to arbitrate and dismiss the Plaintiff’s Amended Complaint.

Dated: August 30, 2018

Respectfully Submitted,

MARINER FINANCE, LLC

By Counsel,

BRADLEY ARANT BOULT CUMMINGS LLP

/s/ Andrew J. Narod

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**ROSEBORO NOTICE**

Pursuant to Local Civil Rule 7(K), and consistent with the requirements of *Roseboro v. Garrison*, 528 F.2d 309 (4th Cir. 1975), you are hereby warned that:

- (1) You are entitled to file a response opposing this motion and that any such response must be filed within twenty-one (21) days of the date on which the dispositive or partially dispositive motion is filed; and
- (2) The Court could dismiss the action on the basis of the moving party's papers if you do not file a response; and
- (3) You must identify all facts stated by the moving party with which the pro se party disagrees and must set forth the pro se party's version of the facts by offering affidavits (written statements signed before a notary public and under oath) or by filing sworn statements (bearing a certificate that it is signed under penalty of perjury); and
- (4) You are also entitled to file a legal brief in opposition to the one filed by the moving party.

Dated: August 30, 2018

/s/ Andrew J. Narod

Counsel

**CERTIFICATE OF SERVICE**

I, Andrew J. Narod, do hereby certify that a true and exact copy of the foregoing has this day been forwarded to all parties of record by depositing a copy of the same in the United States Mail, first class postage prepaid, and addressed as follows:

Mr. Lamont Harris  
612 Chimborazo Boulevard  
Richmond, VA 23223  
*Plaintiff*

Dated: August 30, 2018

/s/ Andrew J. Narod  
Counsel